

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

**IN RE:**

**SAN JUAN BAUTISTA MEDICAL  
CENTER, CORP.**

**Debtor**

**CASE NO.: 11-2270 (BKT)**

**CHAPTER 11**

**MOTION FOR AN EXTENSION OF TIME OF TEN (10) DAYS TO SUBMIT  
DEBTOR'S SCHEDULES AND STATEMENT OF FINANCIAL AFFAIRS**

**COMES NOW**, San Juan Bautista Medical Center Corp., the Debtor in Possession, and the Debtor hereinafter, through the undersigned attorney, **STATES and PRAYS**:

1. The Debtor submitted its petition for Bankruptcy under Chapter 11 of the Bankruptcy Code on March 18, 2011.
2. The Debtor's schedules and statement of financial affairs are due to be submitted on April 1, 2011.
3. The instant case is a complicated case with a large number of creditors and required several urgent issues to be addressed at the outset of the case including the emergency provision of electrical services.
4. The Debtor is pleased to report that it has met with PREPA and anticipates submitting a joint stipulation with PREPA providing for continuous electrical services throughout the Bankruptcy case.
5. Due to these urgent meetings and the complicated nature of the case, the Debtor requires an extension of ten days, until April 11, 2011, to submit its schedules and statement of financial affairs.
6. The Debtor contends that this extension will not cause undue delay in the proceedings

because even with the extension, creditors will still have sufficient time to review the schedules prior to the April 28, 2011 § 341 meeting.

7. Further, the additional time will enable the Debtor to present creditors and interested parties with a thorough and complete picture regarding Debtor's affairs.
8. The Debtor makes this request in good faith.
9. Accordingly, the Debtor contends that the extension of ten days to submit the Schedules and Statement of Financial Affairs has sufficient cause and will facilitate the administration of the estate.

WHEREFORE, the Debtor requests an extension of ten (10) days until April 11, 2011 to submit its Schedules and Statement of Financial Affairs.

**RESPECTFULLY SUBMITTED**

In San Juan, Puerto Rico, this 31<sup>st</sup> of March, 2011.

**I HEREBY CERTIFY** that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the parties appearing in said system, including the U.S. Trustee

**C. CONDE & ASSOC.**

S/ Carmen Conde Torres

Carmen Conde Torres, Esq.

USDC 207312

254 San José Street, 5<sup>th</sup> Floor

Old San Juan, Puerto Rico 00901

Telephone: 787-729-2900

Facsimile: 787-729-2203

E-Mail: [condecarmen@microjuris.com](mailto:condecarmen@microjuris.com)

IVAN APONTE FIGUEROA [iaponte@lmctlaw.com](mailto:iaponte@lmctlaw.com), [iaponte@lmctlaw.com](mailto:iaponte@lmctlaw.com); [iaflaw@gmail.com](mailto:iaflaw@gmail.com)

IVAN M CASTRO ORTIZ [icastro@alblegal.net](mailto:icastro@alblegal.net)

CARMEN D CONDE TORRES [notices@condelaw.com](mailto:notices@condelaw.com)

MONSITA LECAROSZ ARRIBAS    ustpregion21.hr.ecf@usdoj.gov

LUIS C. MARINI BIAGGI                    luis.marini@oneillborges.com,  
docket\_clerk@oneillborges.com;rebeca.rodriguez@oneillborges.com;ubaldo.fernandez@oneillb  
orges.com

DANIEL MOLINA LOPEZ    dml@trdlaw.com, i.cartagena@trdlaw.com;noticesdml@yahoo.com